UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

JAY B	RAHMB	ATT) CASE NO.: 1:12 cv 919						
	Plaintif	f, Judge J. Dlott						
vs.) RULE 26(f) REPORT OF PARTIES						
GENEI	RAL PRO	ODUCTS CORPORATION)						
)						
	Defend	ant.)						
attend	1. led by:	Pursuant to Fed. R. Civ. P.26(f), a meeting was held on January 10, 2013 and was						
Ron Siebel, counsel for plaintiff(s) Jay Brahmbatt								
<u>Kathry</u>	n S. W	ood, counsel for defendant(s)General Products Corp.						
	2.	Consent to Magistrate Judge. The parties:						
		unanimously consent to the jurisdiction of the United States Magistrate Judge						
oursua	oursuant to 28 U.S.C. §636(c).							
		do not unanimously consent to the jurisdiction of the United States Magistrate						
ludge pursuant to 28 U.S.C. §636(c) at this time.								
3. Initial Disclosures. The parties:								
		have exchanged the pre-discovery disclosures required by Rule 26(a)(1).						
	will exchange such disclosures by February 20, 2013.							
are exempt from disclosure under Rule 26(a)(1)(E).								
		have agreed not to make initial disclosures.						
	4.	Jurisdiction and Venue						
		 Describe any contested issues relating to: (1) subject matter jurisdiction, (2) personal jurisdiction and/or (3) venue: 						
	Defendant has filed a Motion to Transfer Venue. Plaintiff's response is due on							

<u>Janı</u>	January 25, 2013.				
b.	Describe the discovery, if any, that will be necessary to the resolution of issues relating to jurisdiction and venue:				

C.	Recommended date for filing motions addressing jurisdiction and venue:				
Plaintiff's response is due on January 25, 2013.					
Ame	nendments to Pleadings and/or Joinder of Parties Recommended cut-off date for filing any motion to amend the pleadings and/or to add additional parties: N/A				
b.	(if class action) Recommended date for filing motion to certify the class: N/A				
Rece	Recommended Discovery Plan:				
a.	Describe the subjects on which discovery is to be sought and the nature and extent of discovery that each party will need: Plaintiff has asserted claims of national origin discrimination (O.R.C. 4112), race discrimination (O.R.C. 4112) and Breach of Contract.				
	Defendant disputes liability and damages as to all of these claims. Written discovery shall be exchanged regarding the allegations made in				
	the Complaint. Depositions of the Plaintiff and of General Products personnel will be taken thereafter to determine the factual background of				
	Plaintiff's employment and eventual termination.				
b.	What changes should be made, if any, in the limitations on discovery imposed under the Federal Rules of Civil Procedure or the local rules of this Court?				
	N/A				

c. The case presents the following issues relating to the disclosure of electronically stored information, including the form or forms in which it should be produced:

erma					
The case presents the following issues relating to claims of privilege of protection as trial preparation materials:					
T	he Parties are uncertain as to whether a Protective Order will				
n	ecessary but commit to working together to jointly negotiate an Order i				
b	ecomes necessary.				
	lave the parties agreed on a procedure to assert such claims AFTE roduction?				
	No Yes				
a	Yes, and the parties ask that the Court include their agreement n Order.				
Identify the discovery, if any, that can be deferred pending settleme discussions and/or resolution of potentially dispositive motions:					
d	arties request that, to the extent that a Party retains an expert amages, that discovery regarding the opinions of the expert occur after resolution of dispositive motions.				
50000					
fo	he parties recommend that discovery should proceed in phases , allows: Written discovery and document exchange to be followed				
D	escribe the areas in which expert testimony is expected and indica				
W	hether each expert will be specially retained within the meaning				
F	R.Civ.P. 26(a)(2): Plaintiff and Defendant may retain a damage				
<u>e</u>	xpert.				

7.	Dispositive Motion(s)										
a. Recommended date for filing dispositive motions: November											
8.	8. Settlement Discussions										
a. Has a settlement demand been made? <u>Yes</u> A respo											
	b.										
	c. Date by which a response can be made: NA										
9.											
	(choose one)										
	1	March 20	Settlement Week.								
X _ June 2013			Settlement Week.								
		September 20	Settlement Week.								
	[December 20	Settlement Week.								
10.											
10. Other matters for the attention of the Court.											
Signatures:											
Attorney(s) for Plaintiff(s) Attorney(s) for Defendant(s):											
Attorney(s) for Framilin(s):											
/s Ronald E. Seibel s/ Kathryn S. Wood											
Ohio Bar #	00772	96	Pro Hac Vice	Make the produced has a community of admin							
Trial Attorney	for Plai	ntiff	Trail Attorney for Defe	endant							